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# CHAPTER 6 Program Monitoring

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# Purpose of Program Monitoring

As stewards of public funding, the Utah Commission on Service and Volunteerism needs to ensure that the programs and sites they fund are aware of their contractual requirements and are in compliance with all of the rules, regulations, and provisions governing AmeriCorps funds. To accomplish this, the State Program Manager must create adequate systems for monitoring program/sites that are fully implemented and available in writing.

The site visits allow staff, AmeriCorps Committee, and other AmeriCorps programs to learn more about a program's service activities and community partnerships, to hear success stories about AmeriCorps programs, to ensure compliance with Corporation and state regulations, policies, and grant provisions, to monitor the progress of a program toward meeting its objectives, and to provide suggestions and technical assistance to improve the quality of the programs.

# Components of a Monitoring Strategy

An adequate monitoring strategy features an array of oversight of program/sites, including:

- Document Review
- Compliance Reviews
- Program Quality and Performance Reviews
- Special Audits or Surveys
- One-on-one technical assistance to resolve any issues

#### General

The Utah Commission uses a risk based assessment strategy for monitoring programs. At least annually, and as new projects are funded, Commission staff will assess the risk associated with each sub-grantee using the Risk Assessment Review Form. Monitoring of sub-grantee will be based on risk assessed and follow guidelines outline on the form.

Program site visits are conducted for two purposes:

- 1. To provide assistance on program development and implementation issues; and
- 2. To ensure compliance with AmeriCorps rules and regulations.

All programs should plan for at least one programmatic site visit and one fiscal site visit during the program year. Programs in their first three years of funding typically require more assistance than programs that have been operating for four or more years. When necessary the majority of staff time and energy may be spent visiting and providing assistance to new programs.

Programs may request assistance or a site visit to focus on specific program issues at any time. Staff will accommodate these requests as efficiently as possible.

In addition, all programs with high risk levels, as determined by the Risk Assessment Tool, may receive additional visits from the Commission Program Manager and Fiscal Analyst.

This policy will help to ensure high quality AmeriCorps programs are implemented while maximizing staff time and meeting the recommendations of the Inspector General in regards to program monitoring.

#### PROGRAM MONITORING

# **Preparations**

To prepare properly for a site visit, program staff should:

- Review the Monitoring Tool provided by your Program Manager and be prepared to present any requested documentation.
- Schedule the visit with your Program Officer at a time when the appropriate people will be available for meetings.
- Verify that member time sheets and files are up to date prior to the meeting.

#### Procedure

All visits will be scheduled in advance. The National Service Coordinator will contact you to schedule your monitoring visit(s). At least one week prior to the site visit, a copy of the instruments to be used will be sent to contact person.

After each site visit, a follow-up review and recommendation letter will be e-mailed to contact person/program director within four weeks. The program director will respond to any issues noted on form. The National Service Coordinator will review any/all recommendations and follow-up items during the next quarter through phone calls, e-mails, and site visits as appropriate.

# Monitoring Visits

Typical site visit activities include the following:

All AmeriCorps programs will receive a monitoring site visit during each program year. The purpose of the visit is to assess the program's compliance with federal regulations and to help the program improve systems to pass a federal Office of Inspector General (OIG) audit. Member files (through AmeriCorps Tracking System), program policies and fiscal records will be reviewed during the visit. The Operational Monitoring Guide and Member File Checklist or Fiscal Monitoring Tool will be used during the visit to assess program compliance.

ACTIVITY	INDIVIDUALS INVOLVED
Interview /Document Review	AmeriCorps Program/Site Director
Member File Checks (other types of files?)	AmeriCorps Program/Site Director
Multi-Site Observation of Member Activities	AmeriCorps Members
Field Interviews	Site Supervisor, AmeriCorps Members
Mid Year/Close-Out Interview	AmeriCorps Program/Site Director and Staff

The results of the visit will be reviewed with program staff at the end of the day. The site visit feedback letter sent to the program should include only those issues discussed during the visit.

#### PROGRAM MONITORING

The modules of the program review instrument to be completed are as follows:

#### Modules A/B: Member Documentation/Benefits and Coverage

Member files will be reviewed to determine if required documentation is being kept by the program. The Program Manager will randomly select the member files to be reviewed. All member files reviewed must contain required documentation for a program to receive a "Yes – Appears OK" rating. A program may receive a "Needs Improvement" rating if one file is missing required documentation. If more then one file is missing documentation, the program will receive a "Does Not Meet Requirement" rating. Programs that do not meet a requirement must submit documentation showing full compliance and improve future performance to ensure continued funding.

#### Module C: Time and Attendance Records

Attendance record keeping is critical to both the program and the member. Member's enrollment within 30 days in the federal online system will be verified. The federal system does not tracks member hours, but the Corporation for National and Community Service relies on the end-of-term online certifications in providing education awards to members. The responsibility for tracking hours ultimately rests with the program and timekeeping continues to be a common finding in Audits. Miscalculations and discrepancies, if found, could invalidate the education award a member has received or require your program to cover costs associated with the award. The Commission takes this issue very seriously and the program should be in compliance with all components address in this module.

#### Module D: Policies and Procedures

All programs should be in compliance with all of these issues. Written documentation and/or proof of compliance is necessary in case of an audit and should be provided here. Programs should have written documentation readily accessible, such as training agendas or memos. Programs must have written documentation to receive a "Yes – Appears OK" rating.

#### **Review Outcome**

After the monitoring visit is complete, the Program Manager will provide written feedback relating to the review. It is expected that all programs will receive "acceptable" in all categories. The monitoring review will be used to determine if additional site visits are necessary and may impact a program's renewal application and ability to access additional training funds.

#### Monitoring files:

- Risk Assessment Review Form
- Operational Monitoring Guide
- Member File Checklist
- Fiscal Monitoring Tool

#### HIGH RISK PROGRAMS

Programs designated as high-risk or who request a site visit to focus on specific issues will receive additional visits.

High-risk factors may include, but are not limited to:

- · A change in program director or other key staff
- Legitimate member complaints to the Commission
- Poor past performance by the program (based on progress reports and/or previous site visits)
- Concerns regarding prohibited activities
- · Compliance with reporting deadlines

These visits will be conducted on an on-going basis throughout the program year.

# High-Risk Site Visits

High-risk site visits are conducted to provide targeted assistance on specific issues or concerns.

For program-related visits being conducted because of high-risk factors, the agenda will be determined by the reason for the visit. For example, the agenda for a visit that is being held because of a change in program director will focus on expectations of programs, AmeriCorps regulations and relationship building. The agenda for a visit that is being conducted because of concerns regarding prohibited activities will focus on meeting with members, site supervisors, and program staff to assess whether prohibited activities were taking place and to ensure that prohibited activities do not occur in the future.

When possible, members will be observed in service. The Commission acknowledges that issues such as confidentiality may prevent this. The Program Manager will try to obtain as much information as possible about program activities and services in order to identify best practices or areas for improvement.

The site feedback letter will serve as written documentation of what occurred during the visit.

#### **MONITORING CHECKLISTS**

# Monitoring Checklist

In general, it is expected that program staff will monitor grantees and sites to examine the following:

#### Member Documentation

- Application Form
- Criminal History Checks (BCI, NSOPR, and FBI)
- Eligibility and Enrollment Form
- Retention Statistics (end of term/exit, change of status/term, terms of release)
- · Hours Worked and Service hour records
- Training Received
- Benefits (child care, health care, etc.)
- Member Service Agreement
- Position Description
- Performance Evaluations (at least end of year and mid-term for members serving 900-1700 hours)

# **Program Documentation**

- Grievance Procedures
- Prohibited Activities
- Staff Time keeping
- Progress Toward Meeting Performance Measure Targets
- Measurement Tools
- National Identity (signage, uniforms, published materials)
- Mechanism for Community Input and Collaboration
- Subcontracts or Host Site Agreements (if applicable)

# Member Service Agreement

- Minimum number of hours and other requirements necessary for a post-service education award
- Start and end dates of the member's term of service
- · Amount of the living allowance
- How the member will be paid
- · Description of the other benefits available to the member
- Standards of conduct and sanctions for improper conduct
- Prohibited activities
- Requirements under the Drug-Free Workplace Act
- Termination and suspension rules (including the specific circumstances under which a member can be released for cause)
- Position description for the member
- Grievance procedures
- Any other program-specific requirements
- Signatures of both the member and the program director

# **MONITORING CHECKLISTS**

# **Member Orientation**

- An overview of national service
- Program rules, regulations, and expectations
- Review of the member service agreement
- Training appropriate to activities
- Grievance Procedures

# **Financial Documentation**

- Match (where applicable)
- Receipts for Grant Expenditures
- Internal Controls Systems
- Accounting Systems
- Payroll System
- A-133 Audit (if applicable)

#### **ENROLLMENT AND RETENTION**

In light of the CNCS standards for member enrollment and retention, it is important for the National Service Coordinator to monitor programs closely to keep track of how they are doing in these areas. The standards are:

ENROLLMENT RATE = Total slots filled/total slots awarded.

Enrollment for programs should be 100%.

The Commission requires an explanation from the program at the end of the program year, if enrollment has been below 100%. This may affect consideration for future funding.

RETENTION RATE = Total members exiting with an Education Award/total slots filled.

A target of 90% or above for retention or completion is desired.

CNCS realizes that many programs not yet meeting these rates are nevertheless performing well in their individual circumstances. Also, retention may vary among effective programs depending on the target populations for those programs. However, in order to leverage limited program dollars, CNCS expects programs to strive toward improving their rates of enrollment and retention. During the application process, programs that are not meeting these standards are required to offer a rationale for why not, as appropriate.